

FILED  
UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

AO 91 (Rev. 01/09) Criminal Complaint

## UNITED STATES DISTRICT COURT

20 JUL 30 AM 11:38

for the  
District of New Mexico

CLERK-LAS CRUCES

United States of America

v.

Joanna SCHRODER-Galindo  
Francisco DOMINGUEZ

Case No:

20MJ1342

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date of July 28, 2020 in the county of Dona Ana in the State and District of New Mexico, the defendant violated 8 U.S.C. §1324(a)(1)(A)(ii)(Transporting), 1324(a)(1)(A)(v)(I)(Conspiracy to Violate 1324 - All subsections), an offense described as follows:

engaged in a conspiracy to commit a violation of 8 USC 1324(a)(1)(a)(v)(I) Conspiracy, to wit: 8 USC 1324(a)(1)(a)(ii) Transporting, knowing or in reckless disregard of the fact that, ALIENS, had come to, entered, or remained in the United States in violation of law, transport, or move or attempt to transport or move such aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law

This criminal complaint is based on these facts:

On July 28, 2020, United States Border Patrol Agent (BPA1) was assigned to Zone 18 of the Santa Teresa Border Patrol Station's (STN) Area of Responsibility (AOR) in Sunland Park, New Mexico. At approximately 0358 hours, BPA1 received a radio report from El Paso Sector Radio (KAK880) of a sensor activation near the intersection of McNutt Road and Brickland Road and responded to that area in his marked government vehicle. This area is approximately eight miles east of the Santa Teresa Port of Entry (POE) and is located in Sunland Park, New Mexico. This area is also commonly used by alien and drug smuggling organizations to smuggle people and narcotics illegally into the United States.

☒ Continued on the attached sheet.



Complainant's signature


Fred Medina Jr. Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: July 30, 2020

City and state: Las Cruces, N.M.


GREGORY B. WORMUTH  
U.S. MAGISTRATE JUDGE

Printed name and title

**CONTINUATION OF CRIMINAL COMPLAINT**

**STATE AND DISTRICT OF NEW MEXICO**

**UNITED STATES OF AMERICA**

**V.**

**SCHRODER-Galindo and DOMINGUEZ**

**Continuation of Statement of Facts:**

Immediately upon turning onto Brickland Road from McNutt Road at approximately 0420 hours, BPA1 observed four male subjects wearing dark clothing, run out from bushes along the south end of Brickland Road and into a white Toyota Echo. With the current trend in alien smuggling, BPA1 believed that he was watching an attempted smuggling event in progress.

While activating his vehicle's lights and sirens, BPA1 used his government radio to advise other Agents in the area of his observation. As soon as the subjects saw the marked vehicle's emergency equipment, they began to exit the vehicle and rapidly made their way to the rear of the Toyota Echo. Not wanting the subjects to abscond, BPA1 quickly exited his own vehicle and ran towards the Toyota.

As he approached the white Toyota vehicle, BPA1 identified himself as a United States Border Patrol Agent, drew his service pistol, and ordered the four male subjects outside of the Toyota and the two subjects still occupying the driver and front passenger seats to stop moving and to put their hands in the air. After all six subjects had complied with his orders and the scene was secure, BPA1 relayed his status over the radio and requested the assistance of additional Agents.

Several minutes later, BPA2 from El Paso Border Patrol Station arrived on scene to provide backup for BPA1 as he began a brief field interview of the subjects. The four male subjects who BPA1 had seen running into the Toyota, claimed to be citizens and nationals of Mexico. They also claimed that they did not possess the required documentation to enter, be or remain in the United States legally. At approximately 0424 hours, BPA1 placed those four male subjects under arrest, and they were subsequently transported to STN for further processing.

While determining the citizenship of the driver (DOMINGUEZ) and front passenger (SCHRODER-Galindo), both claimed to be United States Citizens. DOMINGUEZ and SCHRODER-Galindo also told BPA1 that they were lost and SCHRODER-Galindo said that the four male subjects "Just got into the car."

After requesting records checks on the two detained United States citizens, KAK880 advised BPA1 that SCHRODER-Galindo had previously been arrested for alien smuggling and that she had an active warrant out of Las Cruces, New Mexico. Due the circumstances of the encounter, BPA1 placed DOMINGUEZ and SCHRODER-Galindo under arrest at approximately 0433 hours. At approximately 0438 hours, BPA1 read DOMINGUEZ and SCHRODER-Galindo their rights and asked if they were willing to answer his questions without the presence of an attorney. While DOMINGUEZ invoked his right to legal representation, SCHRODER-Galindo waived that right and they were subsequently transported to STN for further interviewing and processing.

**PASSENGER STATEMENT (SCHROGER-Galindo):**

SCHROGER-Galindo stated that she was riding with her friend Francisco DOMINGUEZ. SCHROGER-Galindo stated that they were going to the horse racetrack (Sunland Park Casino) to pick up a friend who was having vehicle problems. SCHROGER-Galindo stated that they got lost and took a wrong turn. SCHROGER-Galindo stated that they were trying to make a U-turn when several subjects ran into the vehicle. SCHROGER-Galindo stated that before the subjects were able to completely get in the vehicle that she saw the emergency light of a Border Patrol vehicle. SCHROGER-Galindo stated the Border Patrol Agent was telling them to put their hands up. SCHROGER-Galindo stated she did not know why the subjects got in the vehicle.

**MATERIAL WITNESS STATEMENT (Mat Wit)**

Mat Wit stated that his wife made arrangements with an unknown female smuggler in Ciudad Juarez, Mexico to smuggle him into the United States. Mat Wit stated he took a bus from his hometown to Juarez, Chihuahua. Mat Wit stated that he was given instructions by the unknown lady once he arrived to Juarez and that he was instructed to go to a hotel called "Hotel Mi Casa". Once at the hotel, Mat Wit stated he received a call from the unknown lady to go to the front of the hotel and that a Ford Explorer would pick him up and drive him to the border. Mat Wit stated that he went to the front of the hotel where he saw a Ford Explorer and boarded the vehicle and the driver took him to a place close to the border where he was instructed to wait. Mat Wit stated the driver left him there and went to go pick up the rest of the members of the group he entered with.

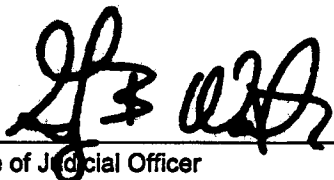
Mat Wit stated they started walking around 8:00 PM. Mat Wit stated that at first, they did have a guide, but half way the guide told them to just keep on walking straight and the pickup vehicle would be there. Mat Wit stated that the guide turned and walked back to Mexico. Mat Wit stated they walked down the mountain until they reached the location where the guide told them the pickup vehicle would be. Mat Wit stated that when they arrived, there was no vehicle waiting for them so he called the female smuggler on the phone and asked her where the pickup vehicle was and she replied by saying that the pickup driver was on its way and that it was going to be a white vehicle. Mat Wit stated they waited a couple of minutes, at which point they saw a white vehicle drive to the location where they were hiding. Mat Wit stated they began running to the car and got into the back seat of the white vehicle. Mat Wit stated as they were trying to rush into the vehicle, he could hear the female passenger telling them, "Hurry up and get in, hurry, hurry!" Mat wit also stated that before they could all get into the vehicle, a Border Patrol Agent arrived and arrested them.

Mat Wit stated he had already made a wire transfer to the female smuggler of \$1,000 United States Dollars (USD) and was supposed to wire transfer the remaining \$3,000 once he arrived safely at Houston, Texas.

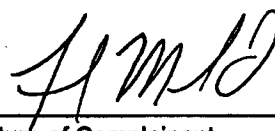
**DISPOSITIONS:**

Assistant United States Attorney (AUSA) Alfred Perez was contacted and presented the 2 on 4 alien smuggling scheme and approved criminal prosecution under 8 USC 1324 Conspiracy to Transport and Transporting for the driver (DOMINGUEZ) and passenger (SCHRODER-Galindo). Both subjects will be remanded to the custody of Luna County Jail pending their initial court hearing.

**Continuation of Statutory Language:**



Signature of Judicial Officer



Signature of Complainant

Medina Jr, Fred  
Filing Agent